1 MICHAEL R. HALL, ESQ. Nevada Bar No. 5978 2 mhall@lawhjc.com 3 HALL JAFFE & CLAYTON, LLP 7425 Peak Drive 4 Las Vegas, Nevada 89128 (702) 316-4111 5 Fax (702) 316-4114 6 Attorneys for Plaintiff Rodney Hermanson 7 UNITED STATES DISTRICT COURT 8 **DISTRICT OF NEVADA** 9 10 CASE NO. 2:19-cv-00656-RFB-GWF RODNEY HERMANSON, an individual, 11 Plaintiff, 12 STIPULATION AND [proposed] ORDER TO EXTEND BRIEFING v. 13 DEADLINES FOR DEFENDANT'S CENTURY NATIONAL INSURANCE MOTION FOR DECLARATORY 14 COMPANY, a foreign insurance company, RELIEF (ECF NO. 81) (First Request) DOES 1-100, individuals; and ROES 1-100, 15 companies, 16 Defendants. 17 18 IT IS HEREBY STIPULATED AND AGREED between Plaintiff RODNEY 19 HERMANSON and Defendant CENTURY NATIONAL INSURANCE COMPANY, by and 20 through their undersigned counsel of record, that good cause exists for the deadline for Plaintiff 21 to file his Response to Defendant's Motion for Declaratory Relief (ECF No. 81) to be extended 22 from November 16, 2020, until **November 23, 2020**, when the Response to Defendant's Motion 23 for Summary Judgment (ECF No. 80) is due. Defendant filed these Motions on November 2, 24 2020. 25 Good cause exists for this extension the dispositive nature of Defendant's Motion, 26 Plaintiff's counsel respectfully requests additional time to prepare responsive briefs. In light of 27 the same and pending the Court's approval, Defendant's counsel has graciously agreed to the 28

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extension, through and until November 23, 2020. 1 2 This is the first extension requested in connection with the underlying Motions, 3 and is presented in good faith and not for purposes of delay. The Parties therefore respectfully request that this Court approve the foregoing stipulation. 4 5 6 DATED this 11th day of November 2020. DATED this 11th day of November 2020. 7 HALL JAFFE & CLAYTON, LLP **BAUMAN LOEWE WITT & MAXWELL** 8 /s/ Michael R. Hall /s/ Michael C. Mills 9 MICHAEL C. MILLS, ESQ. MICHAEL R. HALL, ESQ. Nevada Bar No. 5978 Nevada Bar No. 3534 10 3650 N. Rancho Dr., Ste. 114 7425 Peak Drive Las Vegas, Nevada 89128 Las Vegas, Nevada 89130 11 Attorneys for Plaintiff Attorneys for Defendant Rodney Hermanson Century National Insurance Company 12 13 **ORDER** 14 IT IS SO ORDERED. 15 DATED this <u>12th</u> day of <u>November</u> 2020. 16 RICHARD F. BOULWARE, II 17 UNITED STATES DISTRICT JUDGE 18 19 20 21 22 23 24 25 26 27 28